# FILED

# BEFORE THE BOARD OF OIL, GAS AND MINING DEPARTMENT OF NATURAL RESOURCES STATE OF UTAH

JAN 1 2 2015 SECRETARY, BOARD OF OIL, GAS & MINING

IN THE MATTER OF THE REQUEST FOR AGENCY ACTION OF WHITING OIL AND GAS CORPORATION FOR AN ORDER AUTHORIZING THE VENTING OR FLARING OF GAS FROM THE MORONI 11M-1107 WELL LOCATED IN SECTION 11, TOWNSHIP 15 SOUTH, RANGE 3 EAST, S.L.M., SANPETE COUNTY, UTAH

#### **RESPONDENT'S EXHIBITS**

Docket No. 2015-001

Cause No. 176-05

COMES NOW, International Petroleum Limited Liability Company ("Respondent"), acting by and through its attorney, Anthony T. Hunter, pursuant Utah Admin. Rule R641-105-500, hereby submits the following exhibits in support of its Response to Request for Agency Action, filed January 12, 2015, which it intends to offer into evidence at the hearing scheduled for January 28, 2015.

EXHIBIT "A"	Witness Resume:	Bryon Wixom, Member-Manager
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International Petroleum Limited Liability Company

(1 page)

EXHIBIT "B" Leasehold Map:

Map of Section 11, Township 15 South, Range 3

East, SLM, showing location of Respondent's

leasehold interests (1 page)

EXHIBIT "C" Correspondence:

Email printout dated September 26, 2014 from

Petitioner to Respondent regarding participation terms

in the captioned well (1 page)

EXHIBIT "D" Correspondence:

Email printout dated November 24, 2014 from

Petitioner to Respondent regarding amending the

proposed JOA for the captioned well (1 page)

#### Respectfully submitted this 12th day of January, 2015.

By:\_\_

Anthony T. Hunter #11675

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Wichita, KS 67212

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Attorney for International Petroleum Limited Liability Company

4834 South Highland Drive

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Salt Lake City, Utah 84117

## Bryon M. Wixom

### **Professional Accomplishments**

- Over 28 years experience in Oil and Gas
- Participated in 150+ oil and gas wells in North Dakota, Texas, Louisiana, Alabama, Mississippi, Nevada, Wyoming, Utah, and New Zealand. Including deep high pressure wells.
- Participated in shooting over 400 square miles 3D Seismic surveys in the Gulf Coast - Resulting in drilling multiple discovery wells.
- · Operated several oil or gas fields.
- Involved in oil and gas leasing of over 500,000 acres.
- Started and managed several oil and gas companies.
- Negotiated agreements, sales contracts, or joint ventures with several billion+ dollar companies.
- Managed projects, employees, and companies that have endured many years.

#### **Professional Experience**

#### Member-Manager - International Petroleum, LLC

Salt Lake City, Utah • 1998 - Present

Managed projects, employees, consultants, and land teams.

### Member-Manager - Bro Energy, LLC

Salt Lake City, Utah - 2008 - Present

Managed projects, consultants, land teams.

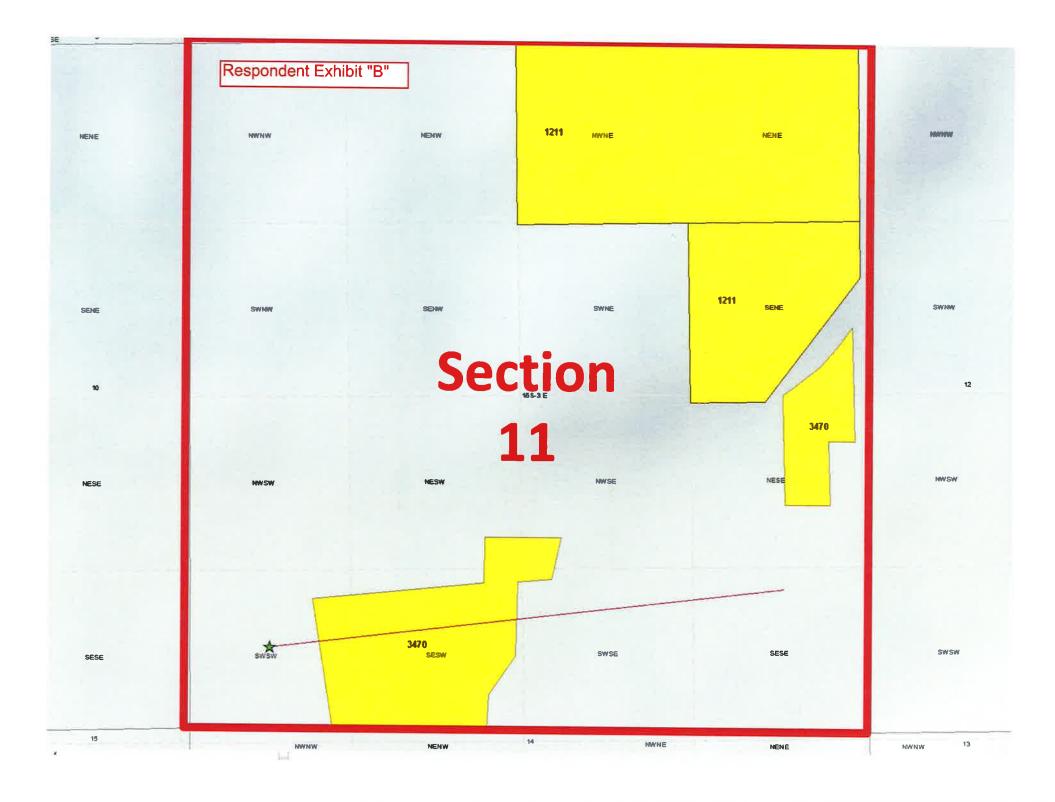
## President/Manager - Other International Petroleum Entities

Salt Lake City, Utah 1989 - Present

Managed projects, employees, and land teams

#### Skills

 President, Manager, Lead Negotiator, Land Experience, Funding and Forming Large Projects.



#### Respondent Exhibit "C"

Subject: Fwd: Sanpete Leases

From: Bryon Wixom (bryonwixom@gmail.com)

To: BRAD@ipetroleum.com; MARK@ipetroleum.com; nate@ipetroleum.com;

Date: Friday, September 26, 2014 4:12 PM

----- Forwarded message -----

From: Paul Joeckel <paul.joeckel@whiting.com>

Date: Fri, Sep 26, 2014 at 3:47 PM

Subject: RE: Sanpete Leases

To: Bryon Wixom <a href="mailto:bryonwixom@gmail.com">bryonwixom@gmail.com</a>>

Cc: David Seery < DaveS@whiting.com>

Brian – I just tried to call you on your cell and left voicemail. Wanted to clarify that the minerals you leased are subject to an Election Letter mailed by Whiting to both Patricia and James Reeder on August 27, 2014 with the election period expiring on October 2, 2014. Assuming you leased both parties your share of the combined cash call is \$530,032.16. If you intend to join please sign the election letters indicating so, along with the AFE and forward your check in the amount of \$530,032.16. Otherwise there is an election to sublease this acreage under terms disclosed therein.

If you elect **not to participate** in the well or fail to make a timely response to the terms of this election letter Whiting will subsequently make application to force pool the interest and assess a risk penalty in accordance with proceedings for statutory pooling pursuant to Utah Code Ann. § 40-6-5 (2009) of the Utah Oil and Gas Conservation Commission General Rules.

I am out of the office next week but you may call me on my cell (303-483-11) if you wish to discuss.

Thanks for your note below and look forward to receiving your timely election.

Paul

Paul Joeckel
Landman V
Whiting Petroleum Corporation
and its wholly owned subsidiary
Whiting Oil and Gas Corporation
1700 Broadway, Suite 2300
Denver, CO 80290
Direct (303) 357-4018
Fax (720) 644-3649

#### Respondent Exhibit "D"

Subject: RE: JOA Moroni 11M-1107

From: Paul Joeckel (paul.joeckel@whiting.com)

To: brad@ipetroleum.com;

Cc: hunterath@gmail.com; bryonwixom@gmail.com; mark@ipetroleum.com; nate@ipetroleum.com;

Date: Monday, November 24, 2014 8:06 AM

The terms and conditions of this Operating Agreement are acceptable to the working interest owners owning over 96% of the DSU. It is highly unlikely that we will be able to accommodate your request for revisions as this from agreement was in place at the time you acquired the interest in the DSU. An experienced operator such as yourselves surely understand that making an election to participate in a well drilling at the time of election would subject you to the terms of the operating agreement in place.

If you would like to give me a call I would be happy to go over your request for revisions.

Paul Joeckel
Landman V
Whiting Petroleum Corporation
and its wholly owned subsidiary
Whiting Oil and Gas Corporation
1700 Broadway, Suite 2300
Denver, CO 80290
Direct (303) 357-4018
Fax (720) 644-3649
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